

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

ELVIN JOSE CEDENO MORALES
IRIS GIGY ROSA VELEZ

Debtor(s)

Case No. **10-02767 BKT**

Chapter 13

MOTION TO AMEND SCHEDULES A, C, I, J, MEANS TEST AND PLAN

TO THE HONORABLE COURT:

Debtors, through the undersigned, hereby move the court as follows:

1. During the meeting of creditors, debtors were requested to provide certain documents and make modifications to the Schedules.
2. Debtors had made the following amendments as requested
 - a. Request number 1 was related to the amendment of Schedule I, in order to provide the current employer of debtor and more accurate income. Using the pay stubs for the month of May (also requested) we have estimated what should be debtor's most accurate monthly income. This was necessary because debtor was hired late in March by La Concha Renaissance Resort.
 - b. Request number 2 had to do with the value of debtors' real estate which, as disclosed in Schedule A, was unlikely to have enough equity to pay the two mortgages that encumbrance the property. Debtors clarified that they prepared an appraisal that rendered a value of \$121,000.00 and requested a copy of the same to R&G. This appraisal was prepared during year 2010, for the sale of their residence that resulted in a failure.
 - c. Exemptions were modified according to the new values resulting from a change in property's market value and mortgage balances.
 - d. Evidence of income received by debtor before filing bankruptcy was attached to an amended Means Test together with an analysis of the same.
 - e. Plan was amended to correct base, include CRIM secured claim and provide for direct

payment of a Ford Explorer debtors own.

WHEREFORE it is respectfully requested that this Honorable Court take notice of the aforesaid and confirm amended plan dated June 18, 2010.

TRUSTEE IS TO BE NOTIFIED BY THE COURT'S ELECTRONIC SYSTEM and I **CERTIFY** that on this date, a copy of this motion was electronically filed by debtors, using the CM/ECF system, which will send notification to the Standing Chapter 13 Trustee Alejandro Oliveras, Esq., and all other participants. Parties not yet participating in the electronic filing will be notified with a copy of this motion and plan by regular mail to their addresses as per Master Address List.

In Vega Baja, Puerto Rico, this June 18, 2010

/s/ Juan O. Calderon Lithgow
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